

THE LAW OFFICES OF
WELTON K. WISHAM, ESQ
ATTORNEY AND COUNSELLOR AT LAW
43 West 43rd Street, Suite 95
New York, New York 10036-7424

Office (212) 709-8183

Facsimile: (718) 678-8062

October 23, 2015

BY: ECF
Honorable Kenneth M. Karas
United States District Judge
Southern District of New York
United States Courthouse
300 Quarropas Street
Court Room 521
White Plains, New York, 10601-4150

Re: **Vaughn Scott, et. al, v, City of Mount Vernon**, et, al.
14 cv- 04441 (KMK)
Letter Motion: Defendant's Request to Extension of Time

Your Honor,

Please be advised that on October 22, 2015, the City of Mount Vernon Office through the Office of Corporation Counsel assigned the defense of the Parties named in the above stated matter to my office as outside counsel. As such, I am respectfully requesting an extension of time to familiarize myself with all the facts, circumstances and all other matters regarding plaintiff's claims against the City of Mount Vernon, Mt. Vernon police officers Allen, Camilo Antonini, Timothy Briley, Brent Gamble, Steven Sexton and John Does 1-10 as set forth in Plaintiff's Complaint.

As of today, it appears as though all fact discovery has been completed. The Plaintiffs and Defendants' depositions have not been scheduled due to the fact that the prior attorney, Hina Serwani is no longer with the Office of Corporation Counsel.

I am therefore requesting and extension of time of 45 days to familiarized myself with the facts and discovery previously submitted by the parties. In addition, the requested time is necessary in order to prepare, and defend the defendant police officers in anticipation of their depositions, and to depose the Plaintiffs.

Mr. David Allen Thompson, attorney for the defendants was consulted prior to the submission of this request. Mr. Thompson has consented to the request.

I am aware of the fact that your honor has previously set a deadline for the conclusion of all discovery by October 30, 2015.

On behalf of the City of Mt. Vernon, I am therefore requesting a second and final extension of time to complete all discovery no later than December 4, 2015.

I thank the Court for its time and consideration of this very important matter.

Respectfully Submitted,

/s/ Welton K. Wisham, Esq. (WW8674)
Attorney for the Defendants

Cc:

Mr. David Allen Thompson, Esq.
Stecklow Cohen & Thompson
217 Centre Street, 6th Floor
New York, New York 10013
(212) 566-8000
Attorney for the Plaintiffs

Lauren P. Raysor, Esq.
Corporation Counsel for the City of Mount Vernon
1 Roosevelt Square
Mt. Vernon, New York 10550
(914) 665-2374

Lee Bradford Gorson
Assistant Corporation Counsel
1 Roosevelt Square
Mt. Vernon, New York 10550
(914) 665-2374